

Hearing Date & Time: 9/27/07 at 10:00 a.m.

Vincent A. D'Agostino (VAD-0120)
Eric H. Horn (EH-2020)
LOWENSTEIN SANDLER PC
65 Livingston Ave.
Roseland, NJ 07068
Tel: 973.597.2500
Fax: 973.597-2400

-and-

1251 Avenue of the Americas
New York, New York 10020
Tel: 212.262.6700
Fax: 212.262.7402

Counsel to Cingular Wireless n/k/a AT&T Mobility LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Delphi Corporation, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**RESPONSE OF CINGULAR WIRELESS n/k/a AT&T MOBILITY LLC TO DEBTORS'
TWENTIETH OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C. §
502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A) DUPLICATE AND AMENDED
CLAIMS, (B) INSUFFICIENTLY DOCUMENTED CLAIMS, (C) CLAIMS NOT
REFLECTED ON DEBTORS' BOOKS AND RECORDS, (D) UNTIMELY CLAIM, AND
(E) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIMS SUBJECT TO
MODIFICATION, MODIFIED CLAIMS ASSERTING RECLAMATION,
CONSENSUALLY MODIFIED AND REDUCED TORT CLAIMS, AND LIFT
STAY PROCEDURES CLAIMS SUBJECT TO MODIFICATION**

Cingular Wireless, n/k/a AT&T Mobility LLC ("AT&T Mobility"), by and through its undersigned counsel, submits this response (the "Response") to the Debtors' Twentieth Omnibus Objection Pursuant to 11 U.S.C. §502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Duplicate and Amended Claims, (B) Insufficiently Documented Claims, (C) Claims not reflected on

Debtors' Books and Records (D) Untimely Claim, and (E) Claims Subject Modification, Tax Claim Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified and Reduced Tort Claims, and Lift Stay Procedures Claims Subject to Modification (the "Twentieth Omnibus Objection"). In support of the Response, AT&T Mobility respectfully represents as follows:

BACKGROUND

1. On October 8 and 14, 2005, the (the "Petition Dates"), Delphi Corporation and certain of its subsidiaries and affiliates (collectively, the "Debtors") filed their voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under Bankruptcy Code sections 1107(a) and 1108. The Court has ordered joint administration of these cases.

2. Prior to the Petition Dates, AT&T Mobility provided telecommunications services and related services to the Debtors.

3. No Trustee or Examiner has been appointed in these cases.

4. AT&T Mobility filed, among others, claim number 5087 ("Claim 5087"), in the amount of \$31,423.21.

5. On August 24, 2007, the Debtors filed the Twentieth Omnibus Claims Objection wherein they objected to Claim 5087 as "Claims Subject To Modification," seeking to reduce such claim from \$31,423.21 to \$10,761.88 based on the Debtors' initial review of their records.

AT&T MOBILITY'S RESPONSE

6. AT&T Mobility contests the Debtors' proposed reduction of Claim 5087. Indeed, AT&T Mobility has sent, and the Debtors have received invoices and support (the "Invoices") for Claim 5087 in the ordinary course of business prior to the Petition Date that evidence the claim. AT&T Mobility submits that the Invoices properly reflect the \$31,423.21 claim amount. Accordingly, AT&T Mobility respectfully requests that the Court overrule the Twentieth Omnibus Objection as it relates to AT&T Mobility.

WHEREFORE, AT&T Mobility respectfully requests that the Court (i) deny the Twentieth Omnibus Claims Objection with respect to AT&T Mobility, and (ii) grant such other and further relief as proper.

Dated: September 20, 2007

Respectfully submitted,

By: /s/ Eric H. Horn
Vincent A. D'Agostino (VAD-0120)
Eric H. Horn (EH-2020)
LOWENSTEIN SANDLER PC
65 Livingston Avenue
Roseland, New Jersey 07068
Telephone: 973.597.2500
Facsimile: 973.597.2400

Counsel to Cingular Wireless n/k/a AT&T Mobility LLC